

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF MISSISSIPPI  
ABERDEEN DIVISION**

WILL McRANEY

PLAINTIFF

V.

No. 1:17cv080-GHD-DAS

THE NORTH AMERICAN MISSION BOARD  
OF THE SOUTHERN BAPTIST CONVENTION, INC.

DEFENDANT

**NON-PARTY BAPTIST CONVENTION OF MARYLAND/DELAWARE, INC.'S  
URGENT AND NECESSITOUS MOTION TO SEAL**

Baptist Convention of Maryland/Delaware, Inc. (“BCMD”), a non-party, through undersigned counsel, and pursuant to Local Rule 79, respectfully requests that the Court order that portions of Exhibit 13 to Defendant North American Mission Board of the Southern Baptist Convention, Inc.’s (“NAMB”) Motion for Summary Judgment [Doc. 263-14], and those portions of NAMB’s Memorandum in Support of Motion for Summary Judgment [Doc. 264] referencing those portions of Exhibit 13, both be filed under seal and that redacted versions of the exhibit and Memorandum be filed.

In support thereof, BCMD submits the points and authorities set forth in the accompanying Memorandum, which is incorporated herein. In further support of the relief requested herein, BCMD relies on a redacted copy of Exhibit 13, which is attached hereto as Exhibit A.

Pursuant to Local Rule 7(b)(8), and in light of the relief requested to seal private and confidential information that is currently accessible to the public via the Court docket, BCMD requests that the Court treat this matter as urgent, direct Plaintiff and Defendant to promptly file

any memorandum in response to the Motion, and issue a prompt ruling on this Motion.

WHEREFORE, there being clear and compelling reasons for partially sealing Exhibit 13 to NAMB's Motion for Summary Judgment, BCMD respectfully requests that the Court order that Exhibit 13 to Defendant North American Mission Board of the Southern Baptist Convention, Inc.'s Motion for Summary Judgment [Doc. 263-14] be filed under seal; that those portions of NAMB's Memorandum In Support of Motion for Summary Judgment [Doc. 264] that references the sealed portions of Exhibit 13 be filed under seal; and that NAMB be directed to file redacted versions of both Exhibit 13 and NAMB's memorandum..

A proposed Order is attached hereto as Exhibit B.

Respectfully submitted,

**BAPTIST CONVENTION OF  
MARYLAND/DELAWARE**

By Its Attorneys,

*/s/ Adam Stone*

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*/s/ Eric W. Gunderson*

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 19<sup>th</sup> day of May, 2023, a copy of the foregoing Motion was served electronically on all counsel of record via the Court's ECF system.

*/s/ Eric W. Gunderson*

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Eric W. Gunderson, *Pro Hac Vice*